

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4 ATLANTA FEDERAL CENTER 61 FORSYTH STREET ATLANTA, GEORGIA 30303-8960

MAY 07 2014

<u>CERTIFIED MAIL</u> 7010 1060 0002 1703 9843 <u>RETURN RECEIPT REQUESTED</u>

City of Jackson Attn.: The Honorable Charles Tillman Acting Mayor, City Hall 219 South President Street Jackson, Mississippi 39205

Re: Sewershed Evaluation Plan Comment Letter City of Jackson, Mississippi Consent Decree

Case No.: 3:12-cv-790 TSL-JMR

Dear Mayor Tillman:

The U.S. Environmental Protection Agency Region 4 has consulted with the Mississippi Department of Environmental Quality (MDEQ) upon reviewing the Sewershed Evaluation Plan dated February 28, 2014, pursuant to Section V. of the subject Consent Decree above. Please address the comments below, incorporate into a revised Sewershed Evaluation Plan as appropriate and resubmit for approval within 30 days of receipt of this letter, in accordance with Paragraph 13 of the Consent Decree.

- 1. <u>Table 2-1 (pg. 2-1)</u>: The table lists Trahon Creek and Big Creek discharging into the West Bank Interceptor (WBI). It is EPA/MDEQ's understanding that these sewer basins flow into the Trahon Wastewater Treatment Plant and does not affect the WBI. Please correct.
- 2. <u>Table 2-1 (pg. 2-1)</u>: Does Caney Creek actually discharge into the West Bank Interceptor or, as EPA believes, is it a separate sewer pipe that directly enters the influent pump station at the Savanna Street WWTP? Please correct if the Caney Creek sewer basin does not discharge into the WBI.
- 3. Flow Monitoring Results Reporting/Flow and Rainfall Monitoring Data Analysis (pg. 3-9): Please include as part of the monthly Flow Monitoring Program Report, the frequency of flow meter inspection, service, and calibration and specify the minimum acceptable frequency of flow meter inspection.
- 4. Flow and Rainfall Data Analysis (pg. 3-9): The last paragraph states, "In addition, not all wet season storm events will furnish the necessary I/I data to measure and model system responses to significant rainfall events." Please explain the decision making process (conditions or circumstances) in which the City will exclude specific rain events.
- 5. <u>Data Acquisition and Review (pg. 3-10)</u>: When comparing rain data to the calibration sheet, please explain what procedures will be followed if it is determined that the sensor is malfunctioning and that the monthly data set is erroneous.

6. <u>Data Acquisition and Review (pg. 3-10)</u>: Please specify requirements for field inspections to be conducted to confirm meter calibration in both wet and dry conditions to ensure meter accuracy during laminar/turbulent flow.

If you should have any questions regarding the above comments, please contact Mr. Brad Ammons at (404) 562-9769 or via email at ammons.brad@epa.gov.

Sincerely,

Maurice L. Horsey, IV, Chief

Municipal & Industrial Enforcement Section

Clean Water Enforcement Branch

cc: Mr. Les Herrington, P.E.

Mississippi Department of Environmental Quality

Mr. Terry Williamson City of Jackson

Mr. Willie Bell City of Jackson